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September 12, 2016 OFFICE OF GENERAL

Federal Election Commission
Office of Complaints Examination and
Legal Administration
ATTN: Donna Rawls, Paralegal
999 E Street, NW
Washington, D.C. 20436

Re: MUR 7131

Dear Ms. Rawls and Mr. Jordan:

I am writing in response to the complaint filed by Mr. Brian T. Griset indicating that the National Committee to Preserve Social Security and Medicare-PAC (NCPSSM-PAC), and me in my official capacity, may have violated provisions of the Federal Election Campaign Act, as amended.

Mr. Griset alleges illegal coordination among multiple parties, including NCPSSM-PAC, but principally the 2014 campaign of Congresswoman Carol Shea-Porter, a former Congresswoman Shea-Porter congressional staff member, and Senior Votes Count, a political action committee. I deny categorically any involvement by NCPSSM-PAC and/or me personally in this matter.

Mr. Griset's recounting of the actual coordinating actions in the illegal campaign contribution—five central questions and five simultaneous financial transactions—does not mention NCPSSM-PAC. Indeed, Mr. Griset as the complainant does not list NCPSSM-PAC as a respondent.

While Mr. Griset cites specific actions by respondents that he alleges constitute an illegal contribution, he only generalizes with respect to NCPSSM-PAC, mentioning a 2014 contribution to the Shea-Porter campaign and an endorsement of her campaign for re-election and then adding, "NCPSSM has direct ties to Senior Votes Count founders Ernie Powell and John Bauman, both of whom have worked with or for this organization."

In response to Mr. Griset's generalities, please note:

- NCPSSM-PAC's single contribution to Carol Shea-Porter for Congress was issued on September 26, 2013 and properly reported on NCPSSM-PAC's October 2013 Monthly FEC filing, i.e. the contribution was made six months prior to Senior Votes Count's establishment (Senior Votes Count FEC Form 1 dated March 21, 2014) and more than one year prior to the coordinating actions Mr. Griset is alleging.
- 2. NCPSSM-PAC's endorsement of Congresswoman Carol Shea-Porter's re-election was a decision of NCPSSM-PAC's Board of Directors and based on her positions on issues deemed important to the National Committee's membership. NCPSSM-PAC issued no fewer than thirteen

- endorsements in October 2014 in the lead up to that year's election and the timing in question is simply coincidental.
- 3. Mr. Powell was employed briefly by NCPSSM for the period March 6, 2012 through September 2, 2013 and subsequently compensated for consulting services for September and October, 2013. His work for NCPSSM concluded almost five months before Senior Votes Count's establishment and a full year prior to the actions alleged in Mr. Griset's complaint.
- 4. Mr. Bauman was associated with NCPSSM as a volunteer beginning October 16, 2012. This association concluded with a final volunteer expense reimbursement dated July 8, 2013, again many months prior to the actions in Mr. Griset's complaint.

In summary, Mr. Griset's suggestion with respect to NCPSSM-PAC is without merit. I hope you will find this response satisfactory but should you want to discuss or have any further questions, please do not hesitate to contact me.

Sincerely,

Christine Kim Treasurer

National Committee to Preserve Social

Security and Medicare-PAC